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Chief, Technical Accounting Staff

26 November 1954

Area Records Officer

25X1

Proposed Handbook No. Records Disposition

1. Subject issuance has been reviewed and comments are as follows:

! : 	Page	Paragraph	Comments
25X1	Forward		Regulation No. has not been published as
25X1	5	3.b.	of 17 November 1954. The proposed regulation has not been submitted to the Comptroller's Office for concurrence.
!	7	6.b.	It is stated that the Chief, Records Management Division is responsible for the approval of
	26	28.d	Records Control Schedules whereas paragraph 28.d. states that the approving official is the office chief.
	7	6.c.	The office chief should approve all recommenda- tions for the destruction of records within his office.
25X1	7	6.a.	Since Regulation No. is not in existence, what are the specific plans for indoctrination and training of Area Records Officers?
	7	6.e.	What is the intent of the phrase "monitoring and inspection of all records disposition activities" of the Agency? Due to their sensitive nature, some records in the Office of the Comptroller should not be inspected by personnel outside this office.
	7	6. g.	What is the intent of the term "factual data." Concurrence of paragraph 6.g. would depend on the intent.
	7 & 8	7	Concurrence or comments for this section, in which the responsibilities of the Area Records
X	0/0		Officer are set forth, should be obtained from the Comptroller. The condition of the records under the jurisdiction of an Area Records Officer depends upon the cooperation of every individual within an area in addition to the factors set
25X1	02/10/78	The state of the s	forth in the proposed handbook.

COMPLEMENT

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Page	<u>Paragraph</u>	Comments
8 & 9	8	The reporting of the quantity of records destroyed in the current-files area during the fiscal year would require each Division and Staff to maintain statistical records for reporting to the Area Records Officer. Such additional requirement should be postponed due to the existing heavy workloads in the Office of the Comptroller.
12	13.a.	Two omissions were noted in the statutory defini- tion of the word "records." The omissions are in parenthesis, line 5, law (or) in connection; line 6, and (preserved or appropriate for).
16	19	The Chief, Monetary Branch, Finance Division, does not want a records survey made in his office. While a survey of records has been made in the Operations and Liaison Branch, the disposition schedule has not been transferred outside the Comptroller's Office.
26	28. <i>î</i> .	If inclusive dates are included on the Records Control Schedule, an amendment to the schedule will be required for similar records created subsequent to that date; however, it is an advantage to have inclusive dates on the Records Control Schedule for those records that are obsolete and no longer created.
28	28.i.(2)	The phrase "Disposal not authorized" is considered superfluous following the term "Permanent."

2. Objection is taken to paragraph 7 on pages 7 and 8. It is impossible for one individual to control the condition of the files in the Comptroller's Office. The lack of cooperation, lack of interest, and insufficient number of personnel are factors that prevent the establishment and maintenance of good files. I do not feel that one individual could make all surveys and maintain all records as set forth in the handbook within a one year period. At the present time, records that have been authorized for retirement to the Records Center and Archives have not been transferred. This means that those records will be on hand when the second survey is made. This places an unnecessary burden on the Area Records Officer. I do not approve of the method of filing "bulky material" in the Finance Division or the inventories prepared for the same type of material transferred to the Records Center for storage. A memorandum was forwarded to the Chief, Finance Division on 27 November 1953 in which suggestions for filing bulky material were set forth; however, the suggestions were not adopted. The inventories that are currently being prepared for this type of record will not adequately meet the future reference needs. Other filing recommendations have been made that have not been adopted. An Area Records Officer should not be held responsible for files under such circumstances.

COMMENTAL

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	3. See attachment "A" for the text and explanation of Section 7 of the Central Intelligence Agency Act of 1949. This provision should be considered in the review of subject handbook.
25X1	4. It is recommended that concurrence of the proposed handbook be post-poned until Regulation Nois issued and until changes and/or clarifications are made to the comments cited above.

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HM: gmk

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